

Impact of the Elimination of the Integrated Risk Information System (IRIS) program on the Superfund Program

Office of Land and Emergency Management

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Summary: IRIS is the primary source of toxicity values for the Superfund Program and is recommended by the Environmental Council of States and the Department of Defense.¹ Without IRIS, Superfund cleanup actions are more likely to incur delays due to disputes over alternative toxicity values, less consistency, and potential legal challenges.

Impacts of Elimination:

- The purpose of the *Superfund Task Force Recommendations Report (July 25, 2017)*, is to promote expeditious remediation of Superfund sites, reduce the burden on cooperating parties, incentivize parties to remediate sites, encourage private investment in cleanups and sites, and promote revitalization of properties across the county.
- Eliminating the IRIS program will increase the time to assess site risks and establish cleanup levels which will deaccelerate remedial decision making and reduce consistency. This will work against the goals of the Report.
- If IRIS values are not available, updated with new science, or developed for emerging chemicals, the Superfund Program would need to undertake time consuming and costly research, evaluation, and deliberation to settle on the best available toxicity values from other sources.
- Debate and disputes would be likely to occur over the selection or development of alternative toxicity values and would likely extend remediation timeframes.
- Variation in the toxicity values selected for chemicals at Superfund sites would lead to less consistency and potential legal challenges.
- The new TSCA chemical evaluations would not adequately replace IRIS assessments because they will not include consideration of legacy uses, which is the predominate concern for Superfund.

Background

- The IRIS values are considered by EPA to be the best science available on which to base Superfund risk assessments.
- Site-Specific Superfund risk assessments establish the need for response actions, characterize current and future risk to human health, and establish protective cleanup levels.

¹ “The ECOS-DoD Sustainability Work Group generally supports the use of the OSRTI hierarchy to help identify human health toxicity values for use in site-specific risk assessments. Unless compelling scientific reasons suggest otherwise (e.g. newly published peer-reviewed scientific research), IRIS toxicity values would generally be used when available, and in the absence of IRIS values, then PPRTVs would generally be used.”

<https://www.ecos.org/documents/risk-assessment-identification-and-selection-of-toxicity-valuescriteria-for-cercla-and-hazardous-waste-site-risk-assessments-in-the-absence-of-iris-values/>

- The National Contingency Plan Preamble establishes the importance for EPA (and other federal agencies) to use a “consistent data base of toxicological information” to achieve comparability among their risk assessments. IRIS is identified in the preamble as the primary source of toxicity values.
- Based on EPA’s human health toxicity value hierarchy², IRIS toxicity values are generally used when available (over other possible sources).
- IRIS values are used by all EPA cleanup programs, other federal agencies, state and local agencies, international agencies, academia, regulated industries, and environmental organizations.

² <https://www.epa.gov/risk/superfund-risk-assessment-human-health-topics>